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IN THE UNITED STATES DISTRICT COURT DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

Email: bryan.reeves@usdoj.gov

VS.

WICLIFF YVES FLEURIZARD,

Defendant.

INDICTMENT

COUNT 1: 18 U.S.C. § 2199 [Stowaway

on Aircraft]

COUNT 2: 18 U.S.C. § 1029(a)(1)

[Access Device Fraud]

Case: 2:24-cr-00133

Assigned To: Barlow, David Assign. Date: 4/16/2024

The Grand Jury Charges:

COUNT 1

18 U.S.C. § 2199 (Stowaway on Aircraft)

On or about March 17, 2024, in the District of Utah,

WICLIFF YVES FLEURIZARD,

the Defendant herein, without the consent of the owner or person in command of an aircraft, namely, Delta Airlines Flight #1683, and with the intent to obtain transportation, did board, enter and secrete himself on such aircraft and was thereon at the time of departure of said aircraft from an airport within the jurisdiction of the United States, namely Salt Lake City International Airport, all in violation of 18 U.S.C. § 2199.

COUNT 2

18 U.S.C. § 1029(a)(1) (Access Device Fraud)

On or about March 17, 2024, in the District of Utah,

WICLIFF YVES FLEURIZARD,

the Defendant herein, knowingly and with intent to defraud, did produce and use a counterfeit access device as defined in 18 U.S.C. § 1029(e)(1) and (2), namely, a boarding pass for passenger transportation on Delta Airlines Flight #1683, and such offense affecting interstate commerce, all in violation of 18 U.S.C. § 1029(a)(1).

A TRUE BILL:

FOREPERSON OF GRAND JURY

TRINA A. HIGGINS United States Attorney

BRYAN N. REEVES

Assistant United States Attorney